

United States District Court
Southern District of New York

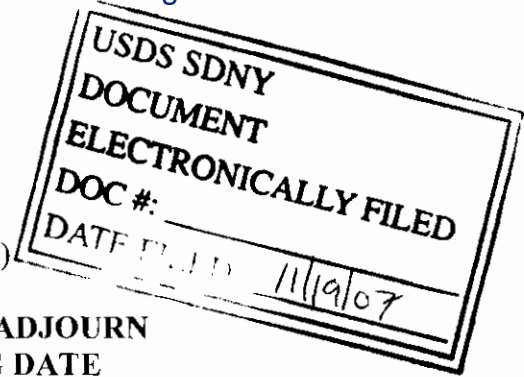
United States of America,
Plaintiff

- against -

Timothy Archer,
Defendant.

07-CR-757(RJS)

**MOTION TO ADJOURN
SENTENCING DATE**



Defendant respectfully moves that the sentencing in this matter, presently scheduled for November 29, 2007, be adjourned in favor of a later date. The request is made to allow undersigned counsel additional time to prepare a sentencing memorandum on behalf of defendant, and to make various other preparation in advance of sentencing. Defendant submits that an adjournment of sentencing best serves the ends of justice and outweighs the best interests of the public and defendant in a speedy trial. Defendant specifically waives statutory or constitutional rights, if any, to an earlier or speedy sentencing.

Undersigned counsel discussed this motion by telephone with Michael Rosensaft, AUSA, attorney for plaintiff United States of America, on November 14, 2007. Mr. Rosensaft expressed that he has no opposition to this Motion, and authorized undersigned counsel to express to the court his consent to this motion.

Dated: November 15, 2007
Toledo, Ohio

Respectfully submitted,

/s/ Thomas P. Kurt

Thomas P. Kurt
Attorney for Defendant
610 Adams St.
Toledo, Ohio 43604
(419) 241-5506

*Defendant's sentencing memorandum
shall be filed not later than Jan 7, 2008.
Gov't Memo due January 14. Sentence adjourned
to JANUARY 16 at 11AM.*

SO ORDERED
Dated:

[Signature]
RICHARD J. SULLIVAN
U.S.D.J.

11/16/07